

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JAMES M. PLASSE,

Plaintiff,

vs.

Civil Action No. 04-CV-30056-MAP

**TYCO ELECTRONICS
CORPORATION,**

Defendant.

AFFIDAVIT OF KENNETH M. BELLO

1. I am a founding partner of the law firm of Bello Black & Welsh, LLP in Boston, Massachusetts. I submit this Affidavit in support of the application of Tyco Electronics Corporation for attorney's fees in the above matter. I have no personal interest in this matter and do not represent either of the parties in this matter.

2. I am a graduate of Brandeis University (magna cum laude) in 1978 and of Boston College Law School (magna cum laude and Order of the Coif) in 1981.

3. Prior to co-founding Bello, Black & Welsh, I was a senior partner in the Employment, Labor and Benefits section of Mintz Levin Cohn Ferris Glovsky & Popeo PC (Mintz Levin). I was an attorney at Mintz Levin for 21 years.

4. I am admitted to practice in all state and federal courts in Massachusetts and before the United States Supreme Court, the First Circuit Court of Appeals, and the Federal District Court for the District of Massachusetts.

5. Throughout my legal career, a substantial portion of my practice has been devoted to the representation of management in a broad range of employment law

matters. I have regularly been lead counsel in defending employers in discrimination, harassment, wrongful discharge, and other employment related law suit.

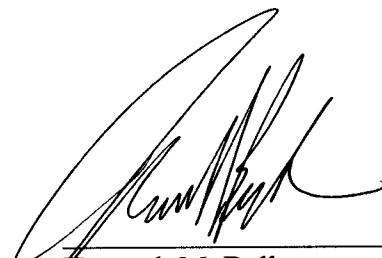
6. I have served as an editor and/or author of two books published by the American Bar Association: Model Jury Instructions in Employment Law Cases, and Employment Law Deskbook. I also have been recognized by Chambers and Partners as a "leading lawyer" in Massachusetts in the area of employment law. I also regularly speak to groups on legal issues relating to labor and employment law. I

7. Based on my years of practice in the Commonwealth of Massachusetts, I am generally familiar with the prevailing hourly rates for lawyers representing management in employment law matters in Massachusetts.

8. In my experience, defense counsel who specialize in employment law matters typically charge the following hourly rates, based upon their years of experience: Partners with more than 20 years experience, \$350.00 - \$500.00; Partners with 15-20 years experience, \$300.00 - \$450.00; Partners with fewer than 15 years experience, \$250.00 - \$400.00; Senior Associates, \$175.00-\$350.00; and Junior Associates, \$150.00-\$250.00.

Dated:

9/26/06



Kenneth M. Bello